

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Maria Del Carmen Ramos	)	
	)	Case No.: 16-14859
	)	
Debtor	)	Chapter: 13

**SECOND AMENDED CHAPTER 13 PLAN**

**YOUR RIGHTS WILL BE AFFECTED.** You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this plan or any motion included below must file a timely written objection. This plan may be confirmed and the motions included below may be granted without further notice or hearing unless written objection is filed before the deadline stated on the separate. Notice you should have received from the bankruptcy court. If you have a secured claim, this is notice that your lien may be voided or modified if you do not object to this plan.

**THIS PLAN DOES NOT ALLOW CLAIMS.** You must file a proof of claim to be paid under any plan that may be confirmed.

**1. PAYMENT AND LENGTH OF PLAN**

A. Debtor shall pay directly to the Chapter 13 Trustee monthly as follows:

1. Commencing August 7, 2016 through July 7, 2017, Debtor shall pay \$250.00 per month to the Chapter 13 Trustee.
2. From August 7, 2017 through August 7, 2018, Debtor shall pay \$500.00 per month to the Chapter 13 Trustee.
3. From August 7, 2018 through December 7, 2018, Debtor shall pay \$660.00 per month to the Chapter 13 Trustee.
4. From January 7, 2019 through December 7, 2019, Debtor shall pay \$780.00 per month to the Chapter 13 Trustee.
5. From January 7, 2020 through December 7, 2020, Debtor shall pay \$895.00 to the Chapter 13 Trustee.
6. From January 7, 2021 through June 7, 2021, Debtor shall pay \$1040.00 to the Chapter 13 Trustee
7. On or before July 7, 2021, Debtor shall make a final payment to the Chapter 13 Trustee in the amount of \$1048.12.

B. Debtor has received in excess of \$3600.00 every year as a federal tax refund from 2013 to the present. Debtor shall provide the Trustee with a copy of the Federal Tax return within 30 days from the date it is filed

yearly while the Plan is in effect. Debtor shall pay the Trustee a lump sum amounts as follows:

1. On or before May 31, 2018, Debtor shall pay the Trustee \$3600.00.
2. On or before May 31, 2019, Debtor shall pay the Trustee \$3600.00.
3. On or before May 31, 2020, Debtor shall pay the Trustee \$3600.00.
4. On or before May 31, 2021, Debtor shall pay the Trustee \$3600.00.

D. The length of the total plan is a period of **60** months.

E. Total amount to be paid to Trustee shall be not less than \$54,088.12.

**2. PRIORITY CLAIMS (INCLUDING ADMINISTRATIVE EXPENSES AND SUPPORT)**

None

**3. UNSECURED CLAIMS**

Allowed non-priority unsecured claims shall be paid pro rata.

**4. CURING DEFAULT AND MAINTAINING PAYMENTS**

A. Trustee shall pay the allowed claim for the arrearage, and Debtor shall pay regular post-petition contract payments directly to the creditor, Pennsylvania Housing Finance Agency, secured by the collateral located at 2598 Daniels Lane, Quakertown, Pennsylvania 18951. The creditor has an arrearage of \$49,171.02 set forth in its proof of claim, and the creditor's regular monthly payment is \$1051.00.

**5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

There are no executory contracts and unexpired leases are assumed or rejected.

**6. OTHER PLAN PROVISIONS AND MOTIONS**

**(a) Motion to Avoid Liens under 11 U.S.C. § 522(f).**

There are no liens that impair exemptions.

**(b) Lien Retention. ]**

The allowed secured claim holder shall retain its lien until the lien is released upon payment of allowed secured claims.

**(c) Vesting of Property of the Estate.**

Property of the estate shall revert in Debtor upon confirmation.

**(d) Payment Notices.**

Creditors provided for above in Sections 4 may continue to mail customary notices or coupons to the Debtor or Trustee notwithstanding the automatic stay.

**(e) Order of Distribution.**

Trustee shall pay allowed claims in the following order:

- 1. Trustee Commissions**
- 2. Other Administrative Claims**
- 3. Priority Claims**
- 4. Secured Claims**
- 5. General Unsecured Claims**

Respectfully Submitted:

By: William P. Marshall

WILLIAM P. MARSHALL, ESQUIRE  
Attorney for Debtor,  
Maria Del Carmen Ramos

Dated: August 16, 2017